## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF IOWA CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA	)	No. 20-CR-00006
Plaintiff,	)	
v.	)	Honorable Judge
ROMEL MURPHY,	)	C.J. Williams , Presiding
Defendant	)	

## UNOPPOSED MOTION TO EXTEND DEADLINE FOR FILING OF SENTENCING MEMORANDUM

NOW COMES THE DEFENDANT, Romel Murphy, by and through his attorney, Jeffrey B. Steinback, and respectfully asks this Honorable Court to extend the deadline for filing the sentencing memorandum for 3 days, or Monday, September 20, 2021. In support, the following is offered:

- 1. Defendant Romel Murphy's sentencing memorandum is currently due to be filed on September  $17^{\rm th}$ , 2021.
- 2. Mr. Murphy, and his attorney, the undersigned, have been in contact with AUSA Kyndra Lundquist and have entered into discussions that, when concluded, would most likely enable the parties to streamline an aspect of the sentencing hearing.
- 3. These discussions are expected to conclude by the end of the day on 9/17/21, allowing both parties to edit and finalize their memoranda, and file them by Monday, 9/20/21.
- 4. AUSA Kyndra Lundquist has been contacted and does not oppose this request. If this Honorable Court sees to grant this motion, AUSA Lundquist would also like to file the same day.

WHEREFORE, the defendant, Romel Murphy, prays for an Order granting this motion to extend the deadline for filing the sentencing memoranda by 3 days, to September 20, 2021.

Respectfully submitted,

/s/<u>Jeffrey B. Steinback</u>

Jeffrey B. Steinback

Attorney at Law

8351 Snaresbrook Rd.

Roscoe, IL 61073

847-624-9600